



September 28, 2004

VIA ELECTRONIC SUBMISSION

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte**
WC Docket No. 01-338

Dear Ms. Dortch:

On September 27th and 28th, 2004, Thomas Cohen (The KDW Group LLC), and I Leonard Ray (VP for Business Development, Atlantic Engineering Group) met with the following FCC personnel:

Daniel Gonzalez, Senior Legal Advisor to Commissioner Kevin Martin
Scott Bergmann, Legal Advisor to Commissioner Jonathan Adelstein
Jessica Rosenworcel, Legal Advisor to Commissioner Michael Copps

The purpose of these meetings was to advocate that any Commission action maintain the integrity of the Commission's Fiber-to-the-Home (FTTH) policy, including by ensuring that regulatory relief for any other technology or network architecture must be premised on such technology or architecture providing the same performance and service capabilities as FTTH. The attached presentation was distributed at each meeting.

Yours truly,

Leonard Ray ^{ITEM}

Leonard Ray
Vice President for Business Development
Atlantic Engineering Group

cc: Matthew Brill
Daniel Gonzalez
Scott Bergmann

FTTH is the future.
Hybrid networks are the past.
Promote the future, not the past.



Leonard Ray, VP for Business Development
Presentation for the
Federal Communications Commission
September 27 and 28, 2004

About Atlantic Engineering Group

● Projects of Interest

- Kutztown, PA- FTTP Network
- Bristol, VA- FTTP Network
- Dalton, GA- FTTP Network
- Jackson, TN – FTTP Network
- Provo, UT – FTTP Network
- Quincy, FL - FTTP Network
- Sallisaw, OK – FTTP Network
- Danville, VA- FTTB Network
- Clarksville, TN – FTTB Network
- Morristown, TN- Fiber Network
- Thomasville, GA- HFC Network
- Elberton, GA- HFC Network
- Moultrie, GA- HFC Network
- Newnan, GA- HFC Network
- Tullahoma, TN-HFC Network Design
- Monroe, GA- HFC Network
- Accucomm Telecommunications
Fiber Network (Macon, GA to
Augusta, GA)
- Cartersville, GA Fiber Network
- Graceba HFC Network – Dothan, AL
- Hopkinsville, KY Fiber Network
- Cartersville, GA- Fiber Network
- Calhoun, GA- Fiber Network
- Fort Valley, GA- Fiber Network
- MBC, VA – Fiber Network
- FEC Communications, Dallas, TX
Headend/Central Office



Meeting Objectives

- Emphasis support of the FTTH rules in the FCC's Triennial Review Order
- Encourage the FCC to promote advanced services and not legacy infrastructure
- If necessary, propose a compromise for FTTC, which will avoid reversing the FCC success to date in driving the deployment of next generation broadband (i.e. FTTH)



Triennial Review and FTTH

- I applaud the FCC's bold and brilliant initiative to bring the most advanced broadband possible, FTTH, to all Americans
- FCC's decision...
 - Based on sound technical reasoning
 - Focused on the future
 - Designed to reward investment; more importantly, does not reward legacy stagnation
 - Will encourage the U.S. to catch the world and pass it



The FCC Got the FTTH Rules Right!

Larry Babbio:
2 million
homes passed
for Verizon in
2004

FCC releases final
Triennial Review Order
and confirms FTTH in
green field applications
is free from unbundling

Ivan Seidenberg, DEC, Verizon: "We also are the first telecom company to make a major commitment to homes and small businesses. Our plan is to reach 1 million homes by the end of the year and potentially double that rate in 2005."

Feb '03

Mar

Jun

Aug

Dec

Jan '04

Feb

FCC Press Release:
FTTH in green field
applications is free
from unbundling –
final documents to be
released with in 60
days

John White: Verizon
will select FTTH
vendor in Q3/03 and
deploy FTTH in Q1/04,
Andre Fuetsch: SBC
will follow Verizon with
delay

Verizon press
release
announcing
FTTP vendors
and hat FTTP
roll out will begin
in 2004

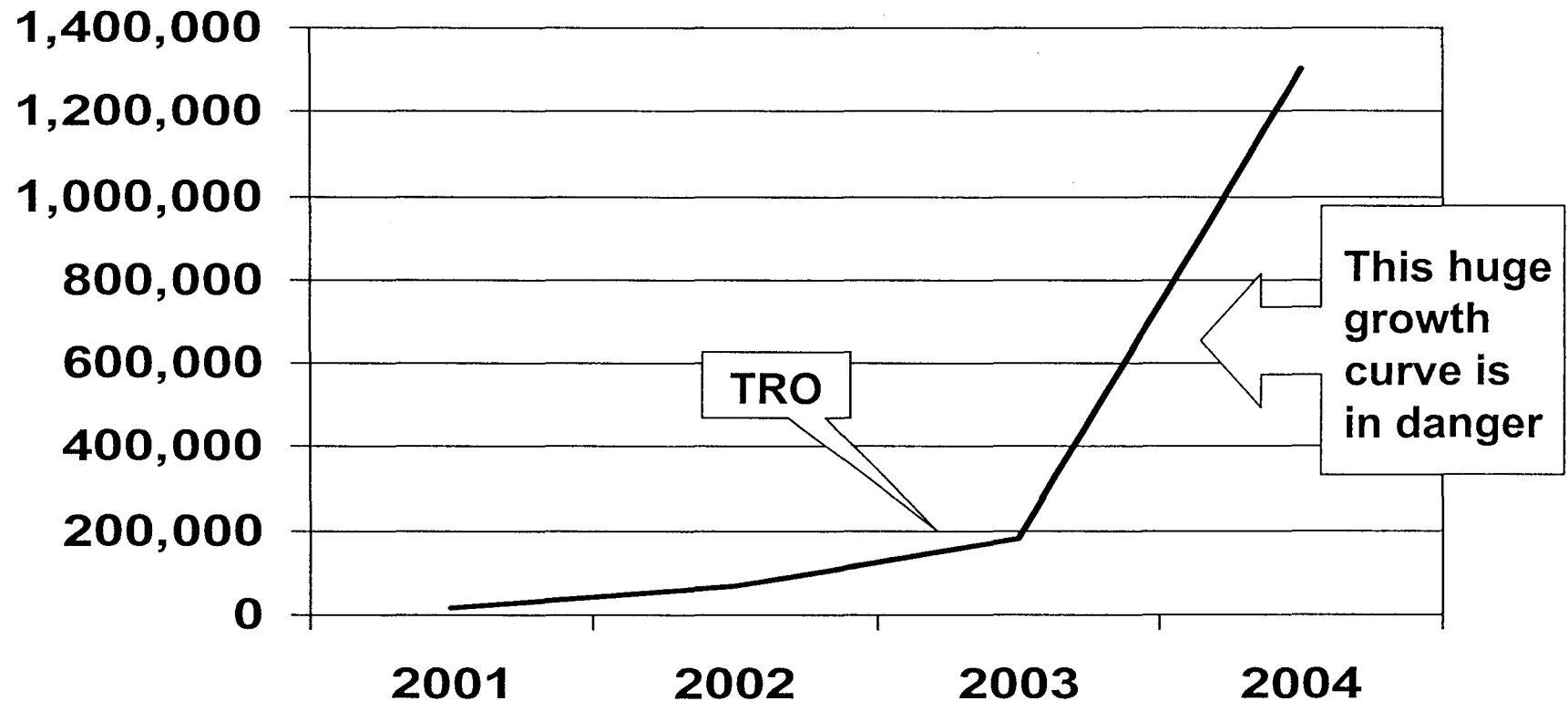
Cristopher T. Rice, VP of Network
Planning and Engineering, SBC
Communications: "2H/2004 –
limited deployment of FTTP in
greenfield applications; 2005 –
deploy FTTP in new builds ~
300,000 premise a year"

Atlantic

Engineering Group



FTTH Homes Passed... Huge Growth



Atlantic

Engineering Group



FTTH is the Future. FTTC is Legacy.

- Equating '500 feet from the node' to FTTH will be a disastrous mistake for the U.S. economy and consumers
 - The existing RBOC legacy plant meets this description only provides ADSL – why reward the RBOCs for doing nothing?
 - Only successful in 'dumbing' down broadband
- The answer is to establish performance specifications



FTTH is Clearly the Future.

	Local Access Medium	Intrinsic Bandwidth of Access Medium	Peak Downstream Delivery	Peak Upstream Bit Rate	Services	Standards
FTTH Architectures:						
APON/BPON	Fiber	25,000 GHz	622 Mbps data 1 GHz video	155 Mbps data	Voice, data, broadcast video, switched digital video, HDTV	G.983.1/ G.983.3
GPON	Fiber	25,000 GHz	2.5 Gbps data 1 GHz video	2.5 Gbps data	Voice, data, broadcast video, switched digital video, HDTV	G.984
EPON	Fiber	25,000 GHz	1 Gbps data	1 Gbps data	Voice, data, switched digital video, HDTV	802.3ah
Ethernet (Pt-Pt)	Fiber	25,000 GHz	1 Gbps data	1 Gbps data	Voice, data, switched digital video, HDTV	802.3ah
FTTC Architectures: (500 ft. subloop)						
With TWP Subloop:						
ADSL	Fiber and Copper	1 MHz	6 Mbps data	640 Kbps data	Voice, data	G.992 GR.909
VDSL	Fiber and Copper	10 MHz	52 Mbps data	6 Mbps data	Voice, data, switched digital video	G.992 GR.909
With TWP and Coax Subloop:						
ADSL plus video	Fiber and Copper and Coax	1.00 GHz	6 Mbps data 1 GHz video	640 Kbps data	Voice, data, broadcast video	G.992 GR.909
VDSL plus video	Fiber and Copper and Coax	1.01 GHz	52 Mbps data 1 GHz video	6 Mbps data	Voice, data, broadcast video	G.992 GR.909

Atlantic

Engineering Group



Recommendations

- 1 – Maintain FTTH / hybrid distinction
- 2 – Maintain the maximum regulatory incentive for maximum technology investment (i.e. total freedom from unbundling for FTTH versus partial freedom for hybrids)
- 3 – If a change is necessary to accommodate FTTC, set a functional equivalent standard that will
 - a) require an FTTC carrier to deploy a capability equivalent to that specified in FTTH standards (i.e. G.983) and
 - B) require that such equivalent capability actually be offered for sale to customers



Conclusion

- The FCC got the broadband rules right
- Do not torpedo your own success
 - by diluting the definition of FTTH by including legacy hybrid networks such as FTTC, VDSL and ADSL
 - by accepting a distance requirement as opposed to a functional equivalency requirement (require the RBOCs to deliver)

